Elves, Robert G.

From: Elves, Robert G.
Sent: Thursday, June 13, 2002 11:34 AM
To: Pfeil, Michael E.
Cc: Podraza, Ken F.; Patskan, George J.; Carmines, Edward L.; Walk, Roger A.; Solana, Rick P.; Garguilo, Thomas M.; Osborne, Kevin (PMMC Legal); Elves, Robert G.
Subject: Trip Report: SRA Forum on Regulatory Peer Review

Attended the Society for Risk Analysis sponsored "Forum on Regulatory Peer Review: Conflict, Consensus, and Credibility" May 29, 2002 at the Sheraton Crystal City Hotel, Arlington VA. (Forum had possible relevance to our best practice, communication, and scientific peer review efforts).

BACKGROUND: Congress has debated several bills over the past several sessions that would expand the scope and role of peer review in regulatory decision making. The US EPA has recently expanded and formalized its peer review policies and practices, culminating in the *Peer Review Handbook* http://www.epa.gov/osp/spc/2peerrev.htm . Last fall, the OMB Office of Information and Regulatory Affairs established for those government peer reviews, practices intended to earn deference on any scientific matters that arises in the context of centralized regulatory review and oversight.

OBJECTIVES: To clarify the range of goals achievable through peer review and science advise, and at the same time, better identify the limits of what peer review can be expected to accomplish.

AUDIENCE: Each of the US Federal agencies was represented with several representatives from the chemical industries and academe.

PRESENTATIONS:

David H. Guston, Rutgers/Bloustein School of Planning and Public Policy – *Regulatory Peer Review: Summary of research supported by NSF grant and the American Chemistry Council.* An excellent summary on peer review in its' various forms and best practices. Covers efforts across each of the federal agencies and has an extensive list of references. [I will forward a copy to each you.]

James D. Wilson, Resources for Future - *Variations on the Peer Review Theme.* Summary: "He who tries to separate science from policy will ultimately be disappointed." Defined and contrasted the terms of "peer review", "peer consultation", and "science advice." Peer review is generally later in the process and peer consultation earlier and more often, and science advice occurs in both and takes into consideration processes, methods, approaches, etc.

Richard B. Belzer, Regulatory Checkbook - *Interests and Incentives in Government Peer Review.* Addresses the primary objective of regulatory peer review as assessing the "essential correctness of all data, methods, inferences and conclusions." Described relationships of reviewee and reviewer.

Steve Lewis, ExxonMobil – *Peer Review: Which Direction form Here?* Advocated the American Industrial Health Council's "Principles" and the work of the EPA SAB (*Safeguarding the Future: Credible Science, Credible Decisions*, 1992) and the US Presidential/Congressional Commission on Risk Assessment and Risk Management http://www.epa.gov/NCEA/pres_com/riskcom2/v2epa.pdf
I will also forward a copy of this presentation).

To: Roger Walk
From: Robbie Elves

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"Peer review is an important and effective mechanism for evaluating the accuracy or appropriateness of technical data, observations, interpretations and the scientific and economic aspects of regulatory decisions." President's Commission, 1997

D. Warner North, NorthWorks, Inc. – *Comments on Peer Review.* Warner was the author of the NAS/NRC "Redbook" describing Risk Assessment and Risk Management (1983). He emphasized that the NAS/NRC recommendation was a conceptual distinction between risk assessment and risk management, not a "heuristic separation" as misread and later interpretation by Guston and William Ruckelhaus. The recommendation was to explicitly distinguish the scientific findings and policy judgements embodied in risk assessments from the political, economic, and technical considerations that influence the design and choice of regulatory strategies. Wilson also mentioned this in his presentation by summarizing, "He who tries to separate science from policy will ultimately be disappointed."

Resha M. Putzrath, Georgetown Risk Group – *Practical Issues in Peer Review.* Suggested that the peer review panel as well as the final document should clearly state the goals and functions of the peer review for that document. That issues, models, and concepts specifically identified for peer review should be noted.

Don Barnes, member, EPA SAB – *EPA Science Advisory Board and Peer Review.* Reviewed the EPA's Peer Review Handbook http://www.epa.gov/osp/spc/2peerrev.htm and the range of activities that Science Advisory Boards may be engaged.

Heather Douglas, University of Puget Sound – *What can one reasonably expect from regulatory peer review.* Reviewed President's Commission remark noted above.

Please call me if you have any questions. I will forward the Guston and Lewis presentations under separate cover. I would recommend to those who may be involved in peer review or have interest in peer review to look at the EPA *Peer Review Handbook* http://www.epa.gov/osp/spc/2peerrev.htm and the US Presidential/Congressional Commission on Risk Assessment and Risk Management Report http://www.epa.gov/NCEA/pres_com/riskcom2/v2epa.pdf .

Best regards,
Robbie Elves

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